

ANDREA T. MARTINEZ, United States Attorney (#9313)  
JAMIE Z. THOMAS, Assistant United States Attorney (#9420)  
STEPHEN L. NELSON, Assistant United States Attorney (#9547)  
STEWART M. YOUNG, Assistant United States Attorney (#9547)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**FARHAN ALI IQBAL,**

Defendant.

Case No. 2:22-mj-00315 DBP

**SEALED COMPLAINT**

COUNT I: Possession of Marijuana with  
Intent to Distribute

COUNT II: Unlawful User of Controlled  
Substances in Possession of Firearms

Honorable Dustin B. Pead

---

Before the Honorable Dustin B. Pead, United States Magistrate Court Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT I**

**21 U.S.C. § 841(a)(1)  
(Possession of Marijuana with Intent to Distribute)**

On or about April 28, 2022, in the District of Utah,

**FARHAN ALI IQBAL,**

the defendant herein, did knowingly and intentionally possess with intent to distribute marijuana,  
a schedule I controlled substance within the meaning of 21 U.S.C. § 812; in violation of Title 21  
U.S.C. § 841(a)(1)(A) and punishable pursuant to 21 U.S.C. § 841(a)(1)(B).

**COUNT II**

**18 U.S.C. § 922(g)(3)**  
**(Unlawful User of Controlled Substance in Possession of Firearms)**

On or about April 28, 2022, in the District of Utah,

**FARHAN ALI IQBAL,**

defendant herein, knowing that he was an unlawful user of a controlled substance as defined in 21 U.S.C. Sec. 802, did knowingly possess firearms, to wit: two AR pistols and one Walther PPQ 9mm handgun, and the firearms were in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(3).

This complaint is made on the basis of an investigation consisting of the following:

**BACKGROUND AND EXPERIENCE**

I, Ben Sullivan, a TFO with HSI, being duly sworn, deposes and states:

1. I have been a law enforcement officer since July of 2009. During that time, I have completed the Utah Peace Officer Standards Training. I have continued to further my training by attending numerous patrol, SWAT, K-9, and drug-related training. Some of these trainings include Basic Narcotics Officer, Rocky Mountain High-Intensity Drug Trafficking, JETWAY Interdiction, and Social Media Exploitation. I was also certified as a K-9 narcotics officer. Most recently I attended the Utah Narcotics Officer Conference, the BBS Narcotics Enforcement Class, and Advanced Undercover Operations Training.
2. I have also developed my own training course involving gangs, narcotics, and various other types of crime in connection to open-source media and law enforcement tools. I have taught this course in multiple states. I have taught at the Utah Narcotics Officers Association (UNOA), Arizona Narcotics Officers Association (ANOA), Colorado Narcotics Officers

Association (CNOA), and taught in multiple states for the High Intensity Drug Trafficking Area program (HIDTA).

3. I have been involved in dozens of drug-related arrests, including organizing "rip buys;" working with confidential informants, and investigations based largely on evidence gathered from social media. In addition to the drug-related arrests, I have written or assisted in serving numerous search warrants with detectives. I have been assigned as a narcotics officer for multiple years. During that time, I worked closely with outside agencies and DEA on multiple drug-related cases. Currently, I am to the Salt Lake County Metro Gang Task Force (MGU) and as a Task Force Officer with (HSI). I have been the case agent and/or assisted in dozens of gang-related investigations ranging from drug distribution to homicide.

The statements in this affidavit are based in part on information provided by law enforcement officers assigned to other law enforcement agencies, other Special Agents, and employees of HSI and on my experience and background as a police officer and TFO of HSI. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant for IQBAL, I have not included details of every aspect of the investigation.

#### **PROBABLE CAUSE**

4. On April 28, 2022, patrol officers with West Jordan Police Department were dispatched to a residence on a domestic violence call. I was asked to respond due to information that the residence contained large amounts of narcotics and numerous firearms. I authored and was granted a search warrant for the residence and IQBAL's truck. Officers located 10 pounds of marijuana and 2 AR pistols inside the residence. Two additional firearms (one Guardian North American Arms .32 caliber pistol and one Walther PPQ 9mm handgun) were located

in IQBAL's truck. Also inside the residence, officers located a money counter, vacuum sealer, and scales, which are indicative of narcotics distribution.

5. IQBAL was interviewed and post-Miranda stated that the marijuana was both his and his wife's. He denied selling marijuana and stated he and his wife smoke about an ounce per day. He admitted that the handguns were his, but the large guns were his wife's. He stated he purchased one of the firearms from a friend and another from Utah Gun exchange. IQBAL's wife stated that she does not smoke marijuana at all and that none of the firearms were hers.
6. I have obtained verbal confirmation from the ATF that the two AR pistols and the Walther PPQ 9mm handgun have affected interstate commerce.
7. Based on the foregoing information, your complainant respectfully requests that a warrant for arrest for FARHAN ALI IQBAL be issued for violations of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 922(g)(3) as detailed above.

*/s/ Ben Sullivan*

---

BEN SULLIVAN  
HSI TFO

SUBSCRIBED AND SWORN to by reliable electronic means on this 29th day of April, 2022.

  
HON. DUSTIN B. PEAD  
CHIEF UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF UTAH

APPROVED AS TO FORM:

ANDREA T. MARTINEZ  
United States Attorney



*/s/ Jamie Z. Thomas*

---

JAMIE Z. THOMAS  
Assistant United States Attorney